

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

PYROTECHNICS MANAGEMENT, INC.,	:	
	:	
Plaintiff,	:	Civil Action No. 2:19-cv-00893
vs.	:	
	:	
XFX PYROTECHNICS LLC and fireTEK,	:	JURY TRIAL DEMANDED
	:	
Defendants	:	
	:	

PROPOSED EXHIBIT LIST OF DEFENDANT, XFX PYROTECHNICS, LLC

Defendant, XFX Pyrotechnics LLC (hereinafter “XFX”), identifies the following exhibits for the August 19, 2020 preliminary injunction hearing:

1. Affidavit of Ralph Piacquadio (Attached to XFX’s Response to Plaintiff’s Request for Preliminary Injunction – ECF Doc. No. 31-1).
2. Printout from website of XF, depicting all fireTEK products sold/distributed by XFX (Attached as Exhibit A-1 to Affidavit of Ralph Piacquadio – ECF No. 31-1).
3. Written communications between XFX and representatives of Defendant, fireTEK, regarding the alleged “Infringing Goods”, as defined in Plaintiff’s Complaint (Previously produced in XFX’s Response to Plaintiff’s First Request for Production of Documents directed to XFX).

Defendant reserves the right to supplement or amend this list up to and through the time of the hearing. Defendant also reserves the right to use any exhibit, whether listed here or not, for purposes of impeachment, rebuttal, or to refresh a witness’ recollection of events. Further, Defendant reserves the right to use any exhibit identified on the Exhibit List of any other party to this proceeding.

Date: August 10, 2020

Respectfully submitted,

ANDREWS & PRICE

By: /s/ Joseph W. Cavrich, Esq.
Joseph Cavrich, Esquire
Pa. I.D. #52693

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Attorneys for Defendant, XFX Pyrotechnics LLC

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a copy of the foregoing **EXHIBIT LIST OF DEFENDANT, XFX PYROTECHNICS, LLC** was filed and served via the Court's ECF system.

ANDREWS & PRICE

By: /s/ Joseph W. Cavrich
Joseph W. Cavrich, Esquire